

<b>Trial Exhibit No. COLUMN A</b>	<b>DATE COLUMN B</b>	<b>Description COLUMN C</b>	<b>DEFENDANTS' OBJECTIONS</b>	<b>PLAINTIFF'S RESPONSES</b>
<b>P-00001</b>	12/5/2019	Frank Chang Deposition, 5/9/2025, Ex. 749: 2017-2018 US Safety Report	NONE	
<b>P-00002</b>	6/30/2022	Cory Freivogel Deposition Exhibit 41: 2019-2020 US Safety Report	NONE	
<b>P-00003</b>	8/30/2024	Cory Freivogel Deposition Exhibit 42: 2021-2022 US Safety Report	NONE	
<b>P-00123</b>	2/12/2016	Uber OKR's	NONE	
<b>P-00176</b>	12/10/2017	Global Driver All Hands (12-13)_1T8-JpoyEDUwUhEvd8HlZgX1QoVrwXfvU2PCBW2eB86Q.pptx	Outside of scope of report (driver supply is not a topic substantively discussed in this marketing expert's report); Hearsay (pg. 94)	Within the scope of her report and opinions. Document was reviewed by Dr. Drumwright, and was on her Materials Considered List. In particular, driver supply is within scope of report as Dr. Drumwright discusses Uber's priority of growth, importance of driver supply and impact on business effecting driver supply (as discussed in Section V of report) and pseudo-corporate social responsibility (as discussed in Section VII of report).  Not hearsay because not offered for the truth of the matter. Hearsay exception because statement goes to Uber's state of mind.
<b>P-00179</b>	12/9/2021	Earnar Long Term Value Update _1wSFJnvKO6eYHKMhXwpPEY1c3RYgGNymiKYzIrKXGhqM.docx	Outside the scope of report (marketing expert report does not address numerical calculations of driver value over time); 401; 403 (years after Turay was onboarded)	Within the scope of her report and opinions. Document was reviewed by Dr. Drumwright, and was on her Materials Considered List. The document discusses Uber's business model including the driver priority status and loyalty programs which pertains to Section V of Dr. Drumwright's report. This subject matter is directly relevant and the probative value exceeds any prejudice.
<b>P-00183</b>	2/23/2021	Fwd: [Highest priority] US driver growth	401; 403 (discusses post-COVID policies re reactivation that have nothing to do w/ Turay. Turay was never blocked, on hold, or deactivated/reactivated)	Plaintiff disagrees but issue is moot as Plaintiff does not intend to use this document on direct examination with Dr. Drumwright.
<b>P-00195</b>	7/23/2018	CONFIDENTIAL- US&C Safety & Insurance _1m4Cw6I4C2GEffXfKIrHomzmt0Vkl vxJ5fvZFo1VTTng.pptx	Outside the scope of report (marketing expert report does not opine on driver supply or growth); 401; 403 (years after Turay was onboarded)	Within scope of report and opinions in that document, which was listed on her materials considered list. The document discusses Uber's priority of growth, importance of driver supply and impact on business effecting driver supply (as discussed in Section V of report) and pseudo-corporate social responsibility (as discussed in Section VII of report).

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<b>P-00260</b>	6/20/2018	Safety & Standards Strategy Brief (Personal S_1WX8bzc9SGba18dmUIMZC9An4iZwjBwF3VhLUAXUgx74.pptx	NONE	
<b>P-00272</b>	11/15/2023	2024 Safety Review w ELT _19UPAi1Pg4Gd_60Hrerv3C8dlPqyhp3KD JZ0HZ3rdh0.pptx	Outside scope of report (marketing expert (unlike stats expert that PI will be calling later in trial, does not provide substantive marketing opinons remincident rates); 401/403 (post-incident rates)	Document within scope of report regarding increasing incident rates. It is on her materials considered list, and discusson of incident rates and "stats" is relevant to her evlauation of Uber's marketing strategy, e.g., focus on safety, despite the reality of sexual assault incident rates on Uber. The information and highly relevant and probative and exceeds any prejudice, which is minimal.
<b>P-00301</b>	11/1/2018	-A-C Privilege- 2019 Bott_1_KR9_U8gqBad_CuLF_1DFKsTe8m7vii3QoEJCLFMXww.pptx	NONE	
<b>P-00304</b>	3/8/2016	Safety Experience 2016 Overview_1NhvMIY50Vmt7P6O-X1wSQk9I9ygbQ2P-phbDr0D1C94.pptx	NONE	
<b>P-00306</b>	9/27/2021	Uber Exercise - Hayley Kahn_1ebAiifUB7P7wkXtBxA3JtDa3Mrb21Z Zh.pdf	401; 403 (Latinex marketing campaign, see .0007 and .00010); also object to .0004 to the extent it contains hearsay	Uber's marketing strategy to Latinas that Uber is safe is relevant and its probative value exceeds any prejudice. The media statements are not offered for the truth of the matter but instead for state of mind.
<b>P-00307</b>	10/12/2022	2023 Planning Offsite - US&C Regional Marketing - P_1QcZ-Kj4XINLI suVfFkXN6-1MzE4YYza2xnM1fPyWie4.pptx	401; 403 (discusses post-COVID policies that have nothing to do w/ Turay)	Turay was an Uber driver post-COVID, and policies and business plans during this time he drove are relevant. The probative value that Turay was never blocked, on hold or deactivated/reactivated despite negative driver feedback and other risk factors outweighs any prejudice, which is nominal at best.
<b>P-00308</b>	4/13/2018	Copy of WIP- Rider Safety Educat_1OgwP5mbuFgY0qoS_VjsaVFhKgxS Wh8N86vAAc0VkYUk.docx	NONE	
<b>P-00312</b>	4/9/2024	CP Deck- Intoxicated Riders_1PuYoyCU18GcPC2QznedId7h1O2K RiGY430lvdVIyCY0.pptx	NONE	
<b>P-00314</b>	N/A	Elizabeth Ross 6/12/25 Witness Binder	NONE	
<b>P-00383</b>	11/14/2019	Copy of US Safety Campaign Phase 2 Audience Targeti_1qK66o2CYGjLyfZcldI19ycGhub0zz 23UbU4p5kqLF_Y.pptx	NONE	
<b>P-00487</b>	N/A	UBER-MDL3084-000067465.pdf	NONE	

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<b>P-00694</b>	12/5/2016	Issues with Safety_1pxz1u5Dj26CN4eeZaLQcj6TARrpJeDEUwqk1EfCx-TU.docx	Outside scope of report (Marketing expert report does not discuss whether or not Uber's safety organization or initiatives were actually effective safety)	Subject matter of document is within the scope of the report addressing pseudo-corporate social responsibility including in Section VII of report. The document includes discussion of how Uber faced the present to grow quickly to get a foothold in the market, which is relevant to Dr. Drumwright's analysis of how marketing strategy was developed and focused. Document was listed on her Materials Considered List
<b>P-00711</b>	2/5/2020	Copy of -Internal- Uber Safety- -We Hea_1CpmWJwmVYEMNq9VwQE1ha3uUBQMvsPUcOfQ4jCfXg9Q.pptx	NONE	
<b>P-00736</b>	11/5/2019	A-C Privilege - Safety Report ELT-Pre-brief_13OXM5m8ZRpdqxvUj32JojEPpcpdazlS_eDJskXNJ70k.docx	NONE	
<b>P-00759</b>	1/24/2017	Internal Safety P-C Needs H1 2017_1mlP0RwWaRSXeszzp-ukZT9Q6XQuPl2avBbOGBRYOsPY.docx	NONE	
<b>P-00760</b>		Hannah Nilles Deposition Exhibit 1307	401; 403 (inflammatory news article re a specific other incident); hearsay (no evidence this was known to Uber, is being offered for the truth that the incident actually occurred as reported in hearay article)	Document is relevant to and probative of Uber's knowledge of sexual assault on its platform. Document not offered for truth of matter asserted but, instead, for notice.
<b>P-00870</b>	3/24/2021	A-C-P Final Internal Safety Governance Recomm_1C1r5fiCu7lguGlyZLWePaOxiFJvcWS3SLfz5hmV32Ns.docx	Subject to pending clawback, Uber reserves all rights.	Special Master Jones ruled several months ago that this document (and 41 other documents) were not privileged. Uber waited several months, and just days before trial, to seek a written entry of that order to pursue an appeal to this Court. At this point Defendants have NOT formally appealed above Judge Breyer but the ball remains in their court.  In addition, on Jan. 12 this Court ruled (ECF 4977) that Uber was prohibited from seeking clawbacks of any document produced prior to Dec. 2025 that is on Pl's exhibit list
<b>P-01054</b>	5/29/2019	qGrsRAAAAAE-MBI-FLAT:2019-05-29T01:26:58.956271	401; 403; hearsay (CNN article re fraudsters; inflammatory reference to "N" word)	Plaintiff disagrees but issue is moot as Plaintiff does not intend to use this document on direct examination with Dr. Drumwright.

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<b>P-01157</b>	1/24/2018	Unknown	401; 403; hearsay	Not intended to be used for the truth of the matter asserted but rather because it is relevant to and probative of Uber's knowledge of sexual assaults, the public's concern about it, and Uber's subsequent course of action to improve the perception of safety on its platform.
<b>P-01177</b>	4/18/2019	-PHASE 1- Project-T Business Decisions deck_1x1TKNQ700O66WijlqKzPmKkhhIkha kW0l-HGsW4X08c.pptx	NONE	
<b>P-01220</b>	10/2/2020	Unknown	401; 403 (message discussing deactivations decisions related to other drivers in 2020); MIL (other driver deactivations)	Plaintiff disagrees but issue is moot as Plaintiff does not intend to use this document on direct examination with Dr. Drumwright.
<b>P-01330</b>	2/7/2024	RideCheck - SOT - 2024_1XhZT9M1r40H3czhKsQupx_mKfV2g F-ujFRiVdEhoe1Y.pptx	Outside scope of report (Marketing expert does not opine regarding safety product effectiveness, ie whether or not RideCheck reduces safety incidents)	Document is within the scope of report regarding opinions discussing anti-warning throughout reports including, for example, Dr. Drumwright's Amended Supplement Report at Section II.7. Document was cited on Materials Considered List.
<b>P-01423</b>		<a href="https://www.bbc.com/news/technology-40196055">Lee, "Uber 'obtained rape victim's medical records,'" BBC (June 8, 2017) https://www.bbc.com/news/technology-40196055</a>	401; 403 (BBC article related to India rape and allegations that a former Uber employee improperly obtained medical records; no evidence to suggest Kalanick authorized or was aware of the incident at the time); hearsay	Highly relevant to and probative of Uber's knowledge of sexual violence on its platform as early as 2014. Not being offered for its truth but rather effect on the listener and to show Uber's MO at the time in investigating claims of Sexual Violence. I.E. Catch and Kill stories under Defendant's MIL 5 that was denied.
<b>P-01447</b>	7/30/2024	-CPD- RideCheck Holdout Group_1nIMfEmQPHQB9WvAJ3jJy_hB5Jfio nyADBoiy4bLBOV.k.pptx	Outside scope of report (Marketing expert does not opine regarding safety product effectiveness, ie whether or not RideCheck reduces safety incidents)	Within the scope of her report and opinions. Document was reviewed by Dr. Drumwright, and was on her Materials Considered List. The document references how Uber's marketing introduced a number of safety features and discusses how safety features are tied to rider sentiment, which are topics discussed in Dr. Drumwright's report.
<b>P-01572</b>	12/13/2017	-FINAL- Stand for Safety - 2018 Strategy and Plan_1jLZt1_6-Ri18iyCrtjV3hCVermzb2pTWaeU0rKhb0s.pptx	NONE	
<b>P-01573</b>		Roger Kaiser Deposition Exhibit 611	NONE	

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P-01735	12/14/2012	FW: Rape early Friday morning in Cleveland Park	401; 403 (alleged incident from 2012, highly inflammatory); hearsay (will be taken to suggest that incident occurred as reported)	Highly relevant to and probative of Uber's knowledge of sexual violence on its platform as early as 2012. Not being offered for its truth but rather effect on the listener.
P-01778		Scope (report does not discuss specific document or profits more broadly); 401; 401 (Proxy Statement)	Scope (report does not discuss specific document or profits more broadly); 401; 401 (Proxy Statement)	This is a document considered by Dr. Drumwright for her report, and it is within scope as Dr. Drumwright opines that Uber's marketing on safety was misleading as it was often in conflict with Uber's business strategy, corporate priorities, finances, and resource allocation, information which is discussed in this document. Uber prioritized safety for growth. <i>See</i> Para 163. Highly relevant to Uber's resources and ability to investigate, design, and implement effective safety features that would have <del>decreased sexual assault on its platform</del>
P-01826		O'Brien, et al., "CNN investigation: 103 Uber drivers accused of sexual assault or abuse," CNN (Apr. 30, 2018)	401; 403; hearsay (will be offered to suggest truth of allegations, PI can offer evidence re how they responded to CNN article, no need for article and inflammatory hearsay)	Not for the truth of the matter asserted but shows Uber's notice that it had a sexual assault problem, that the public now had reason to know about the problem, and is highly probative of what the company did in response to increase safety sentiment of the public and its riders.
P-01850	9/16/2013	Mise à jour de [Uber] : Media inquiry from Valleywag about choking incident in D.C.	401; 403; hearsay (will be offered to suggest truth of allegations; language in later chain in email reiterates this was unfounded allegation)	This is an opposing party statement and not hearsay. It is relevant to and highly probative of Uber's response to public criticism about safety on its platform and subsequent efforts Uber marketed to increase the feeling of safety.
P-01857		<a href="https://www.buzzfeednews.com/article/charlie-warzel/french-uber-bird-huntingpromotion-pairs-lyon-riders-with-a">Warzel, "Sexist French Uber Promotion Pairs Riders with 'Hot Chick' Drivers," BuzzFeed (Oct. 21, 2014)  https://www.buzzfeednews.com/article/charlie-warzel/french-uber-bird-huntingpromotion-pairs-lyon-riders-with-a</a>	401; 403 (program in 2014 in France, no substantive testimony on this issue, does not appear anywhere in record aside from asking Kalanick about it (and was not designated by PI); hearsay (one isolated incident in Paris in 2014 is not an MO and cannot be used to suggest propensity)	Relevant to highly probative of Uber's business operations in 2017 and concerted efforts to make itself appear like safer company. Used not for its truth but Uber's MO.

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<b>P-01860</b>		Newcomer & Rosenblatt, "Here's the Uber Investor Letter That Forced Travis Kalanick Out," Yahoo Finance (Jan. 28, 2019) <a href="https://finance.yahoo.com/news/uber-investor-letter-forcedtravis-201528295.html?guccounter=1">https://finance.yahoo.com/news/uber-investor-letter-forcedtravis-201528295.html?guccounter=1</a>	401; 403 (references to company culture concerns, not driver or rider safety); hearsay	Relevant to and probative of Uber's in-app reporting process, activities with law enforcement, and deactivation processe. The majority of the article is a statement by Uber itself on the departure of its first CEO Travis Kalanick; Highly probative of Uber's business operations in 2017 and efforts to make itself appear like safer company.
<b>P-02317</b>		"The History of Uber." Uber. <a href="https://www.uber.com/newsroom/history/">https://www.uber.com/newsroom/history/</a>	NONE	
<b>P-02456</b>	9/26/2024	Social media post from Uber - fraternity party	401; 403; authenticity; hearsay	Plaintiff disagrees but issue is moot as Plaintiff does not intend to use this document on direct examination with Dr. Drumwright.
<b>P-02654</b>	2/2/2018	Uberversity 2019 - Stand for Safety -Sachin, _1i4iBPdXs5xKW21UIVq4-x1xyuBLIRdzHwc5-QL0w3vo.pptx	NONE	
<b>P-02764</b>	2/13/2015	ProjectXX FINAL.pdf	NONE	
<b>P-03145</b>	9/16/2019	Social media post from Uber - RideCheck	NONE	
<b>P-03270</b>	N/A	UBER-MDL3084-000078461.pdf	NONE	
<b>P-03272</b>	N/A	UBER-MDL3084-000080978.pdf	NONE	
<b>P-03279</b>	#N/A	Ad	NONE	
<b>P-03684</b>		Nilles Ex. 1308 Article: "Napa Woman Shares Terrifying Experience with Uber Driver"	401; 403; hearsay (will be offered for the truth of the allegations, no record evidence that Uber was ever made aware of this article)	Relevant to and probative of Uber's in-app reporting process, activities with law enforcement, and deactivation processe. In addition it isn't being used for the truth of the matter asserted but rather Uber's notice of sexual assault.
<b>P-03685</b>		Nilles Ex. 1309 Article: "Uber Bans Driver After Drug-Related Arrest in Costa Mesa"	401; 403; hearsay (will be offered for the truth of the allegations, no record evidence that Uber was ever made aware of this article)	Relevant to and probative of Uber's in-app reporting process, activities with law enforcement, and deactivation processe. In addition it isn't being used for the truth of the matter asserted but rather Uber's notice of criminal activities by its drivers.
<b>P-03687</b>	2/13/2022	Hertz/Tesla/Uber Press Playbook	401 (Tesla rental calls and green initiatives has nothing to do with this case; Turay did not rent throuh this program and is confusing to the jury to suggest he would have received this marketing apples to oranges)	Relevant to show Uber's marketing efforts in general, support Plaintiff's argument that had Uber wanted to prioritize safety measures it could, and is probative of marketing Turay received either while or during he was leasing a car through Uber.
<b>P-03690</b>	8/26/2018	Economist Briefing for Tony_1LJynV1E7Jbo1Jbnc42okcQZLBWSK9MS llxnMFF9WnE.docx	NONE	

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P-3609		Uber Financial Document	Scope (report does not discuss specific document or profits more broadly) ,401;403	This is document was filed by Uber with the SEC. It is highly probative of Uber's business operations, prioritization, and purported focus on safety measures. This is a document considered by Dr. Drumwright for her report, and it is within scope as Dr. Drumwright opines that Uber's marketing on safety was misleading as it was often in conflict with Uber's business strategy, corporate priorities, finances, and resource allocation, information which is discussed in this document. Uber prioritized safety for growth. <i>See e.g.</i> Para 163
P-01044	7/11/2017	Re: State of Safety Snapshot	NONE	
P-01133	7/12/2016	Safety H2 Plan (2016)_1BOPKGOQyQeEuXL0zi4Mk9ENcE vYgR76J-lAFUbME5Go.docx	NONE	
P-00740	11/18/2019	tLIYJAAAAAE-MBI-FLAT:2019-11- 17T20:29:36.725951	401; 403; hearsay; MIL (see bench brief)	See Trial Brief- Media Related Evidence. ECF 4961.
P-04506	10/24/2018	Moving Forward - campaign retrospective_11phpGp8SiwZEUGAU5y4JCu_ f4scs1pLKkzFI_IL7g0.pptx	NONE	

**Objections to  
demonstrative**

Slide 14 consistent  
with our exhibit  
objections above  
Slide 15, foundation,  
scope, consistent with  
objections to PX-  
3609; PX-1178